

EXHIBIT B

Disclosure as to Expert Witness Lorenzo Vidino

I. Statement of Opinions, Bases and Reasons

The following is “a complete statement of all opinions that the government will elicit from the witness in its case-in-chief, or during its rebuttal to counter testimony that the defendant has timely disclosed under [Rule 16](b)(1)(C), and the bases and reasons for them,” Fed. R. Crim. P. 16(a)(1)(G)(iii):

As previously disclosed, the government expects to call Dr. Lorenzo Vidino, Director of the Program on Extremism at George Washington University, to address various aspects of the Islamic State of Iraq and al-Sham (“ISIS”). See ECF No. 83 (October 21, 2022 Supplemental Expert Disclosure).

Dr. Vidino is expected to testify regarding ISIS and its history, structure, strategic goals, geographic location, methods of recruitment, and jihadist terminology. Dr. Vidino will testify about the geographic bases of operation of ISIS, including areas of primary operation and other locations where ISIS had a presence during the relevant time period. Dr. Vidino will testify that ISIS, which has been known by several names during its history, was founded by Abu Musab al-Zarqawi. In 2004, it was designated as a foreign terrorist organization, under the name al-Qaeda in Iraq, by the U.S. Secretary of State. In May 2014, the designation was amended to add the alias the Islamic State of Iraq and the Levant (“ISIL”); the Islamic State of Iraq and al-Sham; the Islamic State of Iraq and Syria; Dawla al Islamiya and Daesh, among other aliases.

In 2014, ISIS announced a change of name to the “Islamic State,” proclaimed itself a caliphate, and pronounced Abu Bakr al-Baghdadi as the caliph. Dr. Vidino will explain that the “caliphate” is or was a nation organized under ISIS’s interpretation of Islamic law, and that, at that time, ISIS controlled certain territory located in Iraq and Syria. Dr. Vidino will testify that ISIS’s proclamation of the caliphate was widely publicized, and substantial public attention was paid to ISIS’s accretion of territory in Iraq and Syria. Dr. Vidino will describe the public statements and objectives of ISIS and its leaders, which included the establishment of Abu Bakr al-Baghdadi as the leader for Muslims worldwide. He is also expected to testify that certain individuals, including Abu Omar al-Shishani and Bajro Ikanovic, were prominent officials within ISIS.

Dr. Vidino will testify that from 2014 through 2019, ISIS was the deadliest terrorist organization in the world. Dr. Vidino will testify that, during that time period, ISIS captured a significant amount of land in Iraq and Syria. In the summer of 2014, propaganda released by ISIS and ISIS adherents encouraged Muslims from around the world to engage in “jihad.” Around mid-2014, in particular, ISIS came to control a number of cities in Iraq, including Mosul. Dr. Vidino will testify that ISIS engaged in acts of extreme violence in the territories it controlled.

Dr. Vidino will testify also that ISIS relied heavily on the Internet to recruit foreign fighters to fight on behalf of ISIS in Iraq, Syria and elsewhere, including by using web-distributed recruitment videos. Dr. Vidino will generally testify that such recruitment videos typically urged others to either travel to ISIS-controlled territory to join ISIS, or to carry out ISIS’s objectives elsewhere. He is also expected to testify regarding the role and importance of foreign fighters and particularly snipers within ISIS, and particular battles that were of

importance in ISIS history, including the 2019 battle in Baghouz, Syria, and the 2014 battle at Tabqa Airbase.

Dr. Vidino is also expected to address the ISIS-sponsored publications Dabiq and Rumiya. Both were online magazine publications issued by the Al Hayat Media Center, the official media wing of the Islamic State. Dabiq was published from July 2014, shortly after the proclamation of the Islamic State, until July 2016. In September 2016, Al Hayat began publishing Rumiya, until approximately September 2017. In sum and substance, the two publications carried content consistent with ISIS's objectives of recruiting radical jihadists to join ISIS in Syria to build a caliphate. Over time, these publications began to include content encouraging radical jihadists to carry out attacks against non-Muslims in their home countries by various means. The government expects that Dr. Vidino will also define and provide context for various terms and phrases, such as caliphate, jihad/jihadist, bayat, khalifah, and others.

Finally, Dr. Vidino is expected to discuss the establishment of ISIS affiliates in several other locations beyond the region of Syria and Iraq, including but not limited to the Sinai Peninsula in Egypt; Afghanistan (a/k/a "Khorasan"); Libya; Somalia; and Sudan. Dr. Vidino will also address terrorist attacks committed outside the Syria/Iraq conflict zone by ISIS or ISIS-affiliates, or otherwise claimed by ISIS, including but not limited to the November 2015 shooting and bomb attacks in Paris, France; the Holey Artisan Bakery shooting attack in Dhaka, Bangladesh, on July 1-2, 2016; and the January 1, 2017, shooting attack in Istanbul, Turkey.

Dr. Vidino has reviewed opinions he has expressed in the testimony he has provided in the last four years, and his opinions, and the bases and reasons for them, remain the same as those he has previously expressed. See, e.g., 3500-LV-12 (Testimony in United States v. Kandic, 17-CR-449 (NGG)).

The above statements are based on Dr. Vidino's approximately 20 years studying extremism, including his extensive research and publications in this area. His relevant experience is listed in greater detail below and can be found in 3500-LV-1.

II. Qualifications

A list of "the witness's qualifications, including a list of all publications authored in the previous 10 years," Fed. R. Crim. P. 16(a)(1)(G)(iii), are contained in a recent curriculum vitae, previously produced in 3500-LV-01.

III. List of Cases

The following is “a list of all other cases in which, during the previous 4 years,¹ the witness has testified as an expert at trial or by deposition,” Fed. R. Crim. P. 16(a)(1)(G)(iii)²:

Approximate Date of Testimony	Case Name & Docket No.	Court
May 2022	<u>United States v. Kandic</u> , Docket No. 17-CR-449	U.S. District Court for the Eastern District of New York
December 2019	<u>United States v. Ahmed</u> , Docket No. 17-CR-151	U.S. District Court for the Eastern District of Texas
September 2019	<u>United States v. Kasimov</u> , Docket No. 15-CR-95	U.S. District Court for the Eastern District of New York
May 2019	<u>United States v. Rahim</u> , Docket No. 17-CR-169	U.S. District Court for the Northern District of Texas
November 2018	<u>United States v. Alebbini</u> , Docket No. 17-CR-71	U.S. District Court for the Southern District of Ohio
September 2018	<u>United States v. Shafi</u> , Docket No. 15-CR-582	U.S. District Court for the Northern District of California
December 2018	<u>United States v. Hendricks</u> , Docket No. 16-CR-265	U.S. District Court for the Northern District of Ohio

Respectfully submitted,


Lorenzo Vidino

¹ In addition to this list, the government has disclosed Dr. Vidino’s testimony from prior to the previous 4 years. See, e.g., 3500-LV-7.

² This list reflects Dr. Vidino’s best efforts to compile his expert testimony over the previous four years. Because Rule 16 did not require the disclosure of such a list prior to December 1, 2022, he may not have kept track of it systematically. He understands that if he learns of additional testimony that should be disclosed, he will supplement this disclosure pursuant to Fed. R. Crim. P. 16(a)(1)(G)(vi).